

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

SHANE BROWN,

Defendant

) Criminal No. 20cr10189

) Violations:

) Count One: Felon in Possession of  
) Firearm and Ammunition  
) (18 U.S.C. § 922(g)(1))

) Count Two: Failure to Register as a Sex  
) Offender  
) (18 U.S.C. § 2250)

) Forfeiture Allegation:  
) (18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Felon in Possession of Firearm and Ammunition  
(18 U.S.C. § 922(g)(1))

The Grand Jury charges:

On or about July 2, 2020, in Boston, in the District of Massachusetts, and elsewhere, the  
defendant,

SHANE BROWN,

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a  
term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and  
ammunition, that is, an SCCY Industries, model CPX-2, 9mm caliber pistol, bearing serial number  
529676, and seven 9mm Luger cartridges.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

Failure to Register as Sex Offender  
(18 U.S.C. § 2250)

The Grand Jury further charges:

Between on or about May 7, 2020 and July 2, 2020, in Boston, in the District of  
Massachusetts, and elsewhere, the defendant,

SHANE BROWN,

an individual required to register under the Sex Offender Registration and Notification Act and  
having traveled in interstate commerce, knowingly failed to register and update his registration as  
required by the Sex Offender Registration and Notification Act.

All in violation of Title 18, United States Code, Section 2250.

FIREARM FORFEITURE ALLEGATION  
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922, set forth in Count One, the defendant,

SHANE BROWN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes, but is not limited to, the following:

- a. an SCCY Industries, model CPX-2, 9mm caliber pistol, bearing serial number 529676; and
- b. seven 9mm Luger cartridges.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

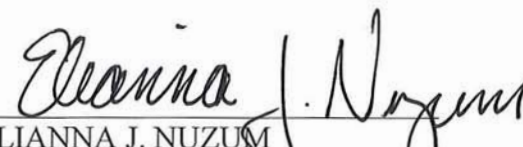
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL

  
FOREPERSON

  
ELIANNA J. NUZUM  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: SEPTEMBER 9, 2020  
Returned into the District Court by the Grand Jurors and filed.

/s/ Thomas F. Quinn 9/9/20 @ 12:15pm  
DEPUTY CLERK